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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JULIAN TOCKER, an individual,
Plaintiff,

CASE NO.: 2:25-cv-01050-ART-MDC

vs.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their undersigned attorneys that the discovery cut-off date of December 17, 2025, be continued for a period of one hundred and twenty (120) days from the Court's prior order (ECF No. 14), for the purpose of allowing the parties to complete written discovery, complete the depositions of the parties, experts, and lay witnesses, and any other discovery the parties wish to conduct.

I. DISCOVERY COMPLETED TO DATE

- Disclosure of Documents:
 - Plaintiff served his initial disclosures on July 31, 2025.
 - Defendants served their initial disclosures on July 31, 2025.
 - Plaintiff served his first supplemental disclosures on September 23, 2025.
 - Written Discovery:
 - Plaintiff served his first set of written discovery (requests for production of documents and interrogatories) to Defendants on September 19, 2025.

- 1 • Third-Party Subpoenas:
- 2 ○ Plaintiff served her notice of intent to serve subpoenas duces tecum and notice of
3 taking the deposition of a fact witness for the custodian of records of Caesars
Palace LLC, Caesars Enterprise Services, LLC, and Tao Group and Omnia
Nightclub on July 31, 2025, to which all have responded.

4 **II. DISCOVERY YET TO BE COMPLETED**

5 The Parties have yet to complete the following discovery:

- 6 • serve and respond to initial written discovery;
- 7 • disclose initial and rebuttal experts;
- 8 • take the depositions of fact and expert witnesses;
- 9 • take the deposition(s) of the Defendants' FRCP 30(b)(6) designee(s);
- 10 • Any additional discovery the parties wish to conduct that is permitted by the Nevada
11 Rules of Civil Procedure.

12 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

13 This is the first request for an extension of time. The parties have been and continue to be
14 diligent in their discovery efforts in this document-intensive case. Plaintiff's firm finished a three
15 (3) week-long trial in the Eighth Judicial District Court at the end of August, which involved
extensive briefing. Plaintiff's counsel was also responsible for an employment arbitration in
16 August, which involved post-hearing briefing finalized on September 12, 2025. **Additionally, in**
this case, an extension was granted for amendment of the complaint, and the additional
requested time will allow for necessary discovery following that anticipated amendment.
Additional time is also needed to collect records necessary for expert review. As such, the
17 Parties believe a one hundred and twenty (120) day extension of discovery deadlines and trial is
necessary and reasonable to allow the completion of the aforementioned discovery as well as
18 potentially resolving this case at an early neutral evaluation, which has yet to be scheduled.

19 The parties respectfully submit that the reasons set forth above constitute good cause for
20 this extension. This request is made in good faith, and not for the purpose of delay.

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1 **IV. PROPOSED EXTENDED DEADLINES**

	<u>Current</u>	<u>Proposed</u>
Deadline to amend the pleadings or add parties	11/3/25	No additional extension request.
Deadline for initial expert disclosures	10/20/25	Tuesday, February 17, 2026
Deadline for rebuttal expert disclosures	11/19/25	Thursday, March 19, 2026
Discovery cut-off	12/17/25	Thursday, April 16, 2026
Deadline to file dispositive motions	01/16/26	Monday, May 18, 2026¹
Pre-trial order	02/16/26	Tuesday, June 16, 2026

7 **IT IS SO STIPULATED AND AGREED.**

8 DATED this 29th day of September, 2025.

8 DATED this 29th day of September, 2025.

9 **LAGOMARSINO LAW**

10 /s/ Cristina P. Valentine, Esq.

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15 **ORDER**

16 **IT IS SO ORDERED.**

17 
Hon. Maximiliano D. Couvillier, III
 UNITED STATES MAGISTRATE JUDGE

18 DATED: October 1, 2025

19 ¹ This deadline falls on May 16, 2026, which is a Saturday. As a result, this deadline extends to the next court day of
 20 Monday, May 18, 2026, by operation of FRCP 6.